UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	**MDL No. 2875**
THIS DOCUMENT RELATES TO ALL CASES	**HON. ROBERT B. KUGLER**

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Lori G. Cohen, Esq,**
GREENBERG TRAURIG, LLP
Terminus 200, 3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305
Attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries, Ltd., Actavis, LLC, Arrow Pharm Malta Ltd., and Actavis Pharma (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of **Tony Binsol**, on May 13, 2021, at 9:00 a.m. eastern time, and continuing until completion, via remote deposition while the witness is at her home or office or other location agreed to by the parties, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

David J. Stanoch, Esq.
Kanner & Whiteley, L.L.C.
701 Camp St.
New Orleans, LA 70130
Telephone: 504-524-5777
d.stanoch@kanner-law.com

The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 22, 2021

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/ David J. Stanoch
DAVID J. STANOCH
Kanner & Whiteley, L.L.C.
701 Camp St.
New Orleans, LA 70130
Telephone: 504-524-5777

EXHIBIT A

RULE 30(B)(6) TOPICS (*see* ECF 651-1 for full list of Topics to Teva)

5. The testing performed by Teva or its agents, to evaluate the purity and contents of ZHP's API.

6. The testing performed by Teva or its agents, to evaluate the purity and contents of Mylan's API.

7. The testing performed by Teva or its agents, to evaluate the purity and contents of Teva's finished dose (regardless of intended sale location) manufactured in any facility that manufactured Teva's finished dose for sale in the United States.

8. The testing performed by any entity or person other than Teva or its agents but known to Teva, to evaluate the purity and contents of ZHP's valsartan API.

9. The testing performed by any entity or person other than Teva or its agents but known to Teva, to evaluate the purity and contents of Mylan's valsartan API.

10. The testing performed by any entity or person other than Teva or its agents but known to Teva, to evaluate the purity and contents of Teva's finished dose (regardless of intended sale location) manufactured in any facility that manufactured Teva's finished dose for sale in the United States.

11. The chromatogram and mass spectrometry or other results for all testing by Teva or its agents of ZHP's valsartan API.

12. The chromatogram and mass spectrometry or other results for all testing by Teva or its agents of Mylan's valsartan API.

13. The chromatogram and mass spectrometry or other results for all testing by Teva or its agents of Teva's finished dose (regardless of intended sale location)

manufactured in any facility that manufactured Teva's finished dose for sale in the United States.

14. The chromatogram and mass spectrometry or other results for all testing by any entity or person other than Teva or its agents but known to Teva, of ZHP's valsartan API.

15. The chromatogram and mass spectrometry or other results for all testing by any entity or person other than Teva or its agents but known to Teva, of Mylan's valsartan API.

16. The chromatogram and mass spectrometry or other results for all testing by any entity or person other than Teva or its agents but known to Teva, of Teva's finished dose (regardless of intended sale location) manufactured in any facility that manufactured Teva's finished dose for sale in the United States.

20. The chromatogram and mass spectrometry or other results for all testing by ZHP or its agents of the solvents utilized in the manufacture of ZHP's valsartan API.

21. The chromatogram and mass spectrometry or other results for all testing by Mylan or its agents of the solvents utilized in the manufacture of Mylan's valsartan API.

22. The chromatogram and mass spectrometry or other results for all testing by Teva or its agents of the solvents utilized in the manufacture of Teva's finished dose (regardless of intended sale location) manufactured in any facility that manufactured Teva's finished dose for sale in the United States.

23. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to Teva, of the solvents utilized in the manufacture of ZHP's API.

24. The chromatogram and mass spectrometry or other results for all testing by any entity or person other than Mylan or its agents but known to Teva, of the solvents utilized in the manufacture of Mylan's API.

25. The chromatogram and mass spectrometry or other results for all testing by any entity or person other than Teva or its agents but known to Teva, of the solvents utilized in the manufacture of Teva's finished dose (regardless of intended sale location) manufactured in any facility that manufactured Teva's finished dose for sale in the United States.

26. The chromatogram and mass spectrometry or other results for all testing by Teva or its agents of the production equipment utilized in the manufacture of Teva's finished dose (regardless of intended sale location) manufactured in any facility that manufactured Teva's finished dose for sale in the United States.

27. The chromatogram and mass spectrometry or other results for all testing by any entity or person other than Teva or its agents but known to Teva, of the production equipment utilized in the manufacture of Teva's finished dose (regardless of intended sale location) manufactured in any facility that manufactured Teva's finished dose for sale in the United States.

28. The extent of the nitrosamine contamination of Teva's valsartan finished dose sold in the United States, both in terms of the concentration per pill, and across all of the lots/batches.

32. The modifications with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for ZHP's valsartan API, including: (1) the reasons for the modifications, (2) the testing and evaluation in connection

with the modification, and (3) the relationship between the modifications and the nitrosamine contamination of ZHP's valsartan API.

34. Teva's evaluation and knowledge of the risk of the creation of nitrosamines including NDMA and NDEA as a result of the manufacturing process for ZHP's valsartan API.

35. Teva's evaluation and knowledge of the risk of the creation of nitrosamines including NDMA and NDEA as a result of the manufacturing process for Mylan's valsartan API.

36. Teva's evaluation and knowledge of the health risks of nitrosamines including NDMA and NDEA, including but not limited to as a contaminant of ZHP's valsartan API.

37. Teva's evaluation and knowledge of the health risks of nitrosamines including NDMA and NDEA, including but not limited to as a contaminant of Mylan's valsartan API.

38. Teva's evaluation and knowledge of the health risks of nitrosamines including NDMA and NDEA, including but not limited to as a contaminant of Teva's finished dose.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Tony Binsol.
2. The complete production of Tony Binsol's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2021, I caused the foregoing document to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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DAVID J. STANOCH
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